

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

MARY LODGE,

Plaintiff,

v.

UNITED HOMES, LLC, UNITED PROPERTY GROUP, LLC, YARON HERSHCO, GALIT NETWORK, LLC, OLYMPIA MORTGAGE CORP., BAYVIEW LOAN SERVICING, LLC, BAYVIEW ASSET MANAGEMENT, LLC, U.S. BANK, N.A., AS TRUSTEE FOR BAYVIEW ASSET-BACKED SECURITIES TRUST SERIES 2007-30, and BAYVIEW FINANCIAL MANAGEMENT CORP.

Defendants.

Civil Action No.: CV-05-0187
(KAM)(RLM)

DECLARATION OF EDWARD JOSEPHSON

I, Edward Josephson, co-counsel for the plaintiffs, hereby declare under penalty of perjury that the following is true and accurate description of my experience and account of the hours and costs incurred in litigating the above-captioned case:

1. I became a member of the bar of the State of New York in 1989. I have been a practicing attorney from 1989 to the present.
2. I am admitted to practice before the United States District Court for the Eastern District of New York.
3. I am employed as the Director of Litigation at South Brooklyn Legal Services (SBLS). In this capacity, I support other SBLS attorneys doing complex litigation in all areas of Legal Services practice.

4. Since 2006, I have worked part-time at the Legal Support Unit of Legal Services for New York City providing litigation support to legal services attorneys citywide.

5. I have been involved in the litigation of the six consolidated cases against United Homes and other defendants since June of 2006.

6. Attached is an accurate and contemporaneously created account of hours spent by attorneys at South Brooklyn Legal Services, including myself, pursuing discovery related to the ownership of the Lodge mortgage, responding to the motions to dismiss and for summary judgment on the holder in due course defense, and in assisting the plaintiff's Motion to Strike the Holder in Due Course Defense. South Brooklyn Legal Services has segregated these hours out from our daily time log on the United Homes cases in order to provide the Bayview Defendants and the Court with the total time spent on the activities for which the Court found sanctions were awardable.

Dated: June 15, 2011
Brooklyn, New York



Edward Josephson, Of Counsel
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